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September 6, 2016

VIA ELECTRONIC FILING

The Honorable Ronnie Abrams
United States District Judge
U.S. District Court for the Southern District of New York
40 Foley Square, Room 2203
New York, New York 10097-1312

Re: *Barkau v. California Resources Corporation*, No. 16-cv-02971

Dear Judge Abrams:

We write jointly on behalf of, respectively, plaintiff Bradley Barkau ("Plaintiff") and defendant California Resources Corporation ("Defendant"), in the above-referenced action to request a brief extension of time to the current due dates contained in the Briefing Schedule (Dkt. 8) governing Defendant's motion to dismiss, which was filed on July 8, 2016..

Per the Briefing Schedule Ordered by your Honor on May 6, 2016, Plaintiff's deadline to file his opposition to Defendant's motion to dismiss is currently September 7, 2016, and Defendant's reply papers are due by October 7, 2016. The parties respectfully request an extended deadline, so that opposition papers shall be due by September 21, 2016, and any reply papers shall be due by November 4, 2016. Further, on July 8, 2016, the parties filed a joint letter (Dkt.11) informing the Court that they have agreed to defer the initial conference until briefing of the Defendant's motion to dismiss is complete. On July 8, 2016, the Court So Ordered that on or before October 14, 2016, the parties submit a joint letter regarding whether discovery should be stayed pending resolution of Defendant's Motion. In light of the proposed Revised Scheduling Order, the parties respectfully request that the Court extend time to submit the joint letter regarding whether discovery should be stayed pending resolution of Defendant's motion until November 11, 2016. This is Plaintiff's only request for an extension of time to file opposition papers since the briefing schedule was ordered by the Court. Plaintiff's counsel has conferred with Defendant's counsel, who have consented to this request to extend time and the Proposed Revised Scheduling Order.

A proposed Revised Scheduling Order is appended to this Letter Motion. Counsel are available at the Court's convenience to answer any questions.

Page 2 of 2
September 6, 2016

Very truly yours

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